

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

Case No. 1:18-md-2865-LAK

SKAT TAX REFUND SCHEME LITIGATION

This document relates to:

18-cv-07828; 19-cv-01785; 19-cv-01867; 19-cv-01781; 19-cv-01783; 19-cv-01866; 19-cv-01794; 19-cv-01798; 19-cv-01869; 19-cv-01922; 19-cv-01800; 19-cv-01788; 19-cv-01870; 18-cv-07827; 19-cv-01791; 19-cv-01792; 19-cv-01928; 19-cv-01926; 19-cv-01868; 18-cv-07824; 19-cv-01929; 19-cv-01803; 19-cv-01806; 19-cv-01801; 19-cv-01894; 19-cv-01808; 19-cv-01810; 19-cv-01809; 19-cv-01812; 19-cv-01896; 19-cv-01871; 19-cv-01813; 18-cv-07829; 18-cv-04434; 19-cv-01815; 19-cv-01818; 19-cv-01931; 19-cv-01918; 19-cv-01873; 21-cv-05339.

**DECLARATION OF ELLIOT R. PETERS IN SUPPORT OF REPLY IN SUPPORT OF
MOTION FOR SEPARATE TRIALS**

I, Elliot R. Peters, declare as follows:

1. I am duly licensed to practice law in the State of New York and am a partner with the law firm of Keker, Van Nest & Peters LLP. I serve as counsel for Defendant Michael Ben-Jacob in the above-captioned proceedings.

2. I submit this declaration in support of Defendant's Reply in support of the Motion for Separate Trials. I have knowledge of the facts set forth herein, and if called to testify as a witness thereto, could do so competently under oath.

3. Attached as Exhibit 9 is a true and correct copy of the relevant excerpts from the deposition of Arthur Woodard, taken on November 18, 2021.

4. Attached as Exhibit 10 is a true and correct copy of the relevant excerpts from the deposition of Michael Ben-Jacob, taken on October 11, 2021.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, and that this declaration was executed on June 14, 2024, in Huntington Beach, California.

/s/ Elliot R. Peters

ELLIOT R. PETERS